

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: ABBOTT LABORATORIES, ET  
AL., PRETERM INFANT NUTRITION  
PRODUCTS LIABILITY LITIGATION**

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**Case No. 1:22-cv-00071**

**Judge Rebecca R. Pallmeyer**

**This Document Relates to:**

**ALL ACTIONS**

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**PROPOSED AGENDA FOR  
JUNE 30, 2022 CASE MANAGEMENT CONFERENCE**

The Parties met and conferred on June 29, 2022, to discuss the topics for the upcoming Case Management Conference. Based on those discussions, the Parties propose the following agenda:

1. Discussion regarding formal approval of the Plaintiffs' Leadership Committee, Plaintiffs' Executive Committee, and Plaintiffs' Steering Committee;
2. Disputed issues regarding:
  - a. Direct Filing Order
  - b. Master Complaint;
3. Discussion regarding:
  - a. Plaintiffs' Profile Form; and
  - b. Plaintiffs' Fact Sheet;
4. Discussion regarding coordination with state courts and discovery schedule (in-chambers discussion);
5. Disputed issues to be heard that were not outlined in the Court's June 3, 2022 Minute Order (Dkt. No. 113):
  - a. Protective Order;
  - b. Privilege Order;
6. Updates regarding:
  - a. Joint Coordination Order
  - b. ESI Protocol
  - c. Deposition Protocol

7. Discussion regarding the Bellwether Selection Protocol;
8. Personal Jurisdiction over Mead Johnson
9. Discussion regarding Position Papers, including whether the Court wants Position Papers, and if so, the contents of the Position Papers.

Dated: June 30, 2022

Respectfully submitted,

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